

EXHIBIT Q

Thomas M. Gilberg

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

SOLOMAN OLUDAMISI AJIBADE and)
ADENIKE HANNAH AJIBADE, as)
natural parents of Mathew)
Ajibade, and THE ESTATE OF)
MATHEW AJIBADE and CHRIS)
OLADAPO, its Executor,)
)
Plaintiffs,)
)
vs.) CIVIL ACTION NO.
)
JOHN WILCHER, in his official) 4:16-CV-82-WTM-GRS
capacity as Chatham County)
Sheriff, et al.,)
)
Defendants.)
)
)

VIDEOTAPED DEPOSITION OF

THOMAS M. GILBERG

January 24, 2017

9:43 a.m.

Oliver Maner
218 West State Street
Savannah, Georgia

Annette Pacheco, RPR, RMR, CCR-B-2153

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1 APPEARANCES OF COUNSEL

2 On behalf of the Plaintiffs:

3 WILLIAM F. CASH III, Esq.
4 LEVIN, PAPANTONIO, THOMAS, MITCHELL,
5 RAFFERTY & PROCTOR, P.A.
6 316 South Baylen Street
7 Suite 600
8 Pensacola, Florida 32502
9 850-435-7163
10 bcash@levinlaw.com

11 WILLIAM R. CLAIBORNE, Esq.
12 THE CLAIBORNE FIRM, P.C.
13 410 East Bay Street
14 Savannah, Georgia 31401
15 912-236-9559
16 will@claibornefirm.com

17 On behalf of the Defendants Debra Johnson and Andreux
18 Evans-Martinez:

19 BENJAMIN M. PERKINS, Esq.
20 OLIVER MANER, LLP
21 218 West State Street
22 Savannah, Georgia 31401
23 912-236-3311
24 bperkins@olivermaner.com

25 On behalf of the Defendants Corizon Health, Corizon,
and Gregory Brown:

EMILY C. WARD, Esq.
CARLOCK COPELAND & STAIR, LLP
191 Peachtree Street, NE
Suite 3600
Atlanta, Georgia 30303-1740
404-522-8220
eward@carlockcopeland.com

Thomas M. Gilberg

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1 APPEARANCES OF COUNSEL (Cont'd)

2 On behalf of the Defendants Sheriff John Wilcher and
3 the Chatham County Detention Center:

4 JENNIFER R. BURNS, Esq.
5 CHATHAM COUNTY ATTORNEY'S OFFICE
6 124 Bull Street
7 Suite 240
8 Savannah, Georgia 31401
9 912-652-7884
10 jburns@chathamcounty.org
11
12
13
14
15
16
17
18
19
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21
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25

Also Present: David Liebhauser, Videographer

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1 have to recertify, I think, every three, two or three
2 years as an instructor.

3 Q. When do you think that you read the Taser
4 manual?

5 A. I read the manual when I was an instructor
6 and any updates. After that, I'm no longer
7 instructor. It's the -- and -- nor am I involved in
8 the instruction of it. And the people that train the
9 Taser, which would be our training section, would
10 read that manual.

11 Q. Are you familiar with when the Tasers were
12 removed from the facility, from the jail?

13 A. With the --

14 Q. In May of 2015?

15 A. Yes. Yes, sir.

16 Q. Okay. And were you aware that internal
17 affairs began watching every Taser video that was
18 available at that time?

19 A. No. I -- I knew they were looking at
20 Taser videos, but I don't know if they were looking
21 at every -- I -- you know, I was not made aware of
22 what internal affairs was doing.

23 Q. All right. But you're aware that internal
24 affairs was reviewing the Taser usage that had
25 occurred at the jail?